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June 1, 2015

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *US Airways, Inc. v. Sabre Holdings Corp., et al., No. 1:11-cv-02725-LGS*

Dear Judge Schofield:

I am lead trial counsel for Sabre. My firm, Bartlit Beck, will be handling the witnesses at trial. I was unable to attend the last hearing on May 15 because I was in trial in another matter. I understand that one of the topics discussed at the hearing was a potential trial date. Specifically, I understand the Court stated that we should "assume for the moment that the trial will start on September 28th," but that it would "issue a scheduling order" after deciding whether there will be a jury trial or a bench trial.

Since that hearing, I have learned that my partner Andrew MacNally—who has been a critical member of our trial team since this case was filed, and who will be handling witnesses at trial—has a conflict with a September 28 trial. He is expecting his first child on October 7. Mr. MacNally likely has more knowledge about this case than any other member of our team. In the May 15 telephonic hearing, Ms. Giulianelli stated that she believed Sabre's trial counsel would be available for a September 28 trial date. I have conferred with her, and she too was unaware of this conflict. And Mr. MacNally was not on the call because he was traveling out of the country at the time. We apologize to the Court for not having raised this conflict at the hearing.

For this reason, Sabre requests that the trial date be set for no earlier than October 26. This would still allow the case to be heard in this calendar year. I have conferred with counsel for US Airways about this scheduling issue and US Airways would not agree to our proposed accommodation.

Sincerely,



Chris Lind